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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92065156
Party	Defendant AmeriCoats
Correspondence Address	AMERICOATS 3429 N RUNGE STREET FRANKLIN PARK, IL 60131 UNITED STATES
Submission	Answer
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Date	02/21/2017
Attachments	AMERISHIELD Answer.pdf(45975 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

PPG INDUSTRIES OHIO INC., Petitioner, v. AMERICOATS, Registrant.	Cancellation No. 92065156
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REGISTRANT'S ANSWER TO PETITIONER'S PETITION FOR CANCELLATION

Registrant Americoats ("Registrant") hereby answers the Petition for Cancellation (the "Petition"), filed January 10, 2017, by PPG Industries Ohio Inc. ("Petitioner") as follows:

As to the allegations that Petitioner is damaged by the registration of Registrant's mark in the second sentence of the introductory paragraph of the Petition for Cancellation, Registrant specifically denies the allegation.

1. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 1 of the Petition, and on that basis denies such allegations.
2. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 2 of the Petition, and on that basis denies such allegations.
3. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 3 of the Petition, and on that basis denies such allegations.
4. Admitted.
5. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 5 of the Petition, and on that basis denies such allegations.

6. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 6 of the Petition, and on that basis denies such allegations.

7. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 7 of the Petition, and on that basis denies such allegations.

8. Denied.

9. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 9 of the Petition, and on that basis denies such allegations.

10. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 10 of the Petition, and on that basis denies such allegations.

11. Registrant refers to responses to the allegations in paragraphs 1-10 and incorporates by reference such responses as if set forth in full herein. To the extent that further response is required, Registrant denies the allegations set forth in Paragraph 11.

12. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 12 of the Petition, and on that basis denies such allegations.

13. Registrant is without sufficient information or knowledge to admit or deny the allegations contained in Paragraph 13 of the Petition, and on that basis denies such allegations.

14. Denied.

15. Denied.

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AFFIRMATIVE DEFENSES

1. Petitioner fails to state a claim upon which relief can be granted, and in particular, fails to state legally sufficient grounds for sustaining the cancellation.

WHEREFORE, Registrant contends that the Petition for Cancellation is without grounds and respectfully requests that the Petition for Cancellation be dismissed in its entirety with prejudice.

Dated: February 21, 2017

Respectfully Submitted,

/s/ Jessica Tam

Jessica Tam

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Attorneys for Registrant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of REGISTRANT'S ANSWER TO PETITIONER'S PETITION FOR CANCELLATION is being served by email and by mailing a copy via first class USPS addressed to the following individuals, identified in the Petition for Cancellation as the attorneys of record and correspondents on February 21, 2017:

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/s/ Jessica Tam
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